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Fax (203) 462-1399
pbegos@rc.com
Direct (203) 462-7550

Also admitted in Massachusetts
and New York

By ECF and Email

January 26, 2022

Hon. Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *Plastic and Reconstructive Breast Surgery PLLC v. Cigna Health and Life Insurance Company*
Case No. 1:21-cv-09187-AT
SECOND CONSENT MOTION FOR EXTENSION OF TIME

Dear Judge Torres:

This firm represents defendant, Cigna Health and Life Insurance Company (“Cigna Health”). I write pursuant to L. Civ. R. 7.1 and Rule 1 of Your Honor’s Individual Practice Rules, to request extensions of time to respond to the complaint and to submit a joint letter and proposed Case Management Plan, as set forth below. Counsel for Plaintiff and co-defendant, Geissler’s Supermarket, Inc., consent to this letter motion.

The current deadlines, and the requested extensions, are as follows:

| Filing | Current Deadline | Requested Extension |
|--|-------------------------|----------------------------|
| Joint letter and proposed CMP | February 11, 2022 | March 14, 2022 |
| Joint letter regarding consent to Magistrate Judge | February 11, 2022 | March 14, 2022 |
| Cigna Health’s response to complaint | January 31, 2022 | March 2, 2022 |
| Geissler’s response to complaint | January 31, 2022 | March 2, 2022 |

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This is the second motion for an extension of any of these deadlines. Good cause exists for this extension of time because we need additional time for our client to locate and provide to us documents regarding the medical procedures at issue in this action, to investigate and evaluate Plaintiff's claims, and to consult with and advise our client about an appropriate response to the Complaint. In addition, the parties believe that discussions regarding a joint letter and case management plan would be more productive after both defendants have responded to the complaint.

As noted above, all parties consent to this extension.

Respectfully submitted,



Patrick W. Begos

Cc: All Counsel of Record (*via* ECF)

GRANTED.

SO ORDERED.

Dated: January 27, 2022
New York, New York



ANALISA TORRES
United States District Judge